

Message

From: Allen, Sondra [Allen.Sondra@epa.gov]
Sent: 4/23/2021 11:00:47 AM
To: Rugala, Mary [Rugala.Mary@epa.gov]; Sklaney, Christopher [sklaney.christopher@epa.gov]
CC: Wenograd, Bonnie [Wenograd.Bonnie@epa.gov]; Dinsmore, Andrew [Dinsmore.Andrew@epa.gov]
Subject: RE: ADDITION: FW: ACTION REQUEST: Open UAOs in SEMS Not Captured on the Compliance Monitoring Reports / SEMS Compliance Monitoring Screens

Hi All,

Per our meeting on 4/19, the following actions have been taken in SEMS for the **UAO (UA-1 dated 6/28/1999)** for Keystone Sanitation Landfill:

1. Associated 9 additional parties not previously linked to the UA-1:
 - a.
 - b.
 - c.
 - d.
 - e. **Nonresponsive based on revised scope**
 - f.
 - g.
 - h.
 - i.
2. Disassociated as response actions: OU2 PRP LR (ME-3) and OU4 PRP LR (ME-1)
3. Added Reviewer Comment:
 - a. Per 4/19/21 discussion with Mary Rugala (Attorney) and Chris Sklaney (RPM), UA-1 was superseded by CD-3 dated 9/10/99 and CD-5 dated 4/16/01. As such, the Closed Order or Settlement (IO-4) sub-action was closed with the 4/16/01 date. Also, the response actions originally conducted under UA-1 [OU2 PRP LR (ME-3) and OU4 PRP LR (ME-1)] are now being conducted under CD-3. As such, ME-3 and ME-1 have been disassociated as response actions from UA-1.
4. Updated the Closed Order or Settlement (IO-4) sub-action to 4/16/2001 actual finish.
 - a. Added SCAP Note: Superseded by CD-3 (9/10/99) and CD5 (4/16/01).
5. Associated documents:
 - a. 9/10/99 CD
 - b. 4/16/2001 CD

The updates are reflected on the ENFR-088 and UA-1 no longer appears on the ENFR-072 'Active Enforcement Settlements w/ Ongoing Associated Response Actions' report.

*Sondra (Sandy) Allen
Program Support Section
Program Support & Cost Recovery Branch
Superfund and Emergency Management Division
215-814-3150 (phone)*

From: Rugala, Mary <Rugala.Mary@epa.gov>
Sent: Monday, April 12, 2021 12:57 PM
To: Allen, Sondra <Allen.Sondra@epa.gov>; Sklaney, Christopher <sklaney.christopher@epa.gov>
Cc: Wenograd, Bonnie <Wenograd.Bonnie@epa.gov>; Dinsmore, Andrew <Dinsmore.Andrew@epa.gov>
Subject: RE: ADDITION: FW: ACTION REQUEST: Open UAOs in SEMS Not Captured on the Compliance Monitoring Reports / SEMS Compliance Monitoring Screens

Thanks, Sondra. I will need help in putting this all in context. I am not as accustomed to reviewing these SEMS charts as Chris is...can you please set up a teams call with you, Chris and me. I am available starting Thursday afternoon, or Friday. Have a deadline and taking some leave so this week is jammed. I will also take a closer look at the docs/info you have sent, but I will need a roadmap with you walking me through it.

thx

Mary E. Rugala
Sr. Asst. Regional Counsel
U.S. EPA, Region III (3RC10)
1650 Arch St.
Phila., PA 19103
215-814-2686
215-814-2603 (fax)
rugala.mary@epa.gov

This e-mail, including attachments, is intended only for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner

From: Allen, Sondra <Allen.Sondra@epa.gov>
Sent: Monday, April 12, 2021 12:42 PM
To: Rugala, Mary <Rugala.Mary@epa.gov>; Sklaney, Christopher <sklaney.christopher@epa.gov>
Cc: Wenograd, Bonnie <Wenograd.Bonnie@epa.gov>; Dinsmore, Andrew <Dinsmore.Andrew@epa.gov>
Subject: RE: ADDITION: FW: ACTION REQUEST: Open UAOs in SEMS Not Captured on the Compliance Monitoring Reports / SEMS Compliance Monitoring Screens

Hi Mary,

We have identified the below documents and information in SEMS, and have also added responses in red within your April 12, 2021 9:31 AM email below. Also attached for reference is the ENFR-072 report, which lists all 'active' response settlements for Keystone Sanitation Landfill, and the associated response actions (in-progress actions are highlighted.)

After you've had a chance to review the documents/information provided, we'd be happy to meet to discuss how SEMS should be updated to reflect the appropriate status in regards to the original 9/30/1996 UAO in question, and any other updates that may be needed.

1. UAO (UA-1) dated 6/28/1991:

- a. In regards to the question below about a UAO with owners and the OGD, we located a document with the below language, which led us to the 6/28/1991 UAO.


II. PROCEDURAL HISTORY AND STATEMENT OF FACTS

On or about June 28, 1991, EPA issued a unilateral administrative order (the "Original Unilateral Order") for the Site to eight original generator defendants who sent waste to the Site, as well as to Keystone Sanitation Company, Inc. ("Keystone Sanitation"), **Ex. 6 Personal Privacy (PP)** the alleged owners and operators of the Site. Pursuant to the terms of the Original Unilateral Order, respondents were required to perform the

- b. Page 1 of the UAO lists 12 parties, including Keystone Sanitation Company, Inc. However, in SEMS, only the below 3 parties are linked to the UAO.

SEMS:

Parties Associated with Activity

View  Maximize

	Party Name
<input type="checkbox"/>	Ex. 6 Personal Privacy (PP)
<input type="checkbox"/>	KEYSTONE SANITATION LANDFILL
<input type="checkbox"/>	Ex. 6 Personal Privacy (PP)

Number of Parties: 3

UAO: (parties not linked in SEMS are highlighted)

IN THE MATTER OF

KEYSTONE SANITATION LANDFILL SITE
OPERABLE UNIT NO. 1, UNION
TOWNSHIP, ADAMS COUNTY,
PENNSYLVANIA

Nonresponsive based on revised scope

KEYSTONE SANITATION COMPANY, INC.

Ex. 6 Personal Privacy (PP)

Nonresponsive based on revised scope

Respondents

Docket No.
III-91-56-DC

- i. **QUESTION:** Should balance of the 9 parties listed as respondents to the UAO (highlighted above) be added as associated parties to the UAO in SEMS?
- c. In SEMS, UA-1 is linked to OU2 PRP LR (ME-3) and OU4 PRP LR (ME-1) actions, which are still ongoing, and UA-1 is considered an 'active settlement' with 'Not in Significant Non-Compliance' (i.e., In

Compliance) status on the attached ENFR-072 report. These actions are also associated to CD-3 dated 9/10/99.

Response Action(s) Paid by Parties without Paid Oversight [Associated with Activity]						
View ▾	Maximize					
Select	Work Package Name	Planned Start	Actual Start	Planned Finish	Actual Finish	Scap Comment
<input type="checkbox"/>	PRP RD #001	3/31/1992	3/11/1992	9/30/1995	3/29/1994	FENCE
<input type="checkbox"/>	PRP RA #001	6/30/1995	3/29/1994	3/31/1997	7/29/1994	FENCE
<input type="checkbox"/>	PRP LR #001	2/14/2001	2/14/2001	12/31/2025		Ongoing Pump&Trea
<input type="checkbox"/>	PRP LR #003	2/14/2001	2/14/2001	12/31/2025		OU02 corresponds w

2. **UAO (UA-2) dated 9/30/1996 (the original UAO in question):**

- a. Page 1 of the 9/30/96 UAO lists the respondent as Waste Management of Pennsylvania, Inc. In SEMS, the below parties are linked to the UAO:

Parties Associated with Activity	
View ▾	Maximize
	Party Name
<input type="checkbox"/>	Waste Management of Pennsylvania
<input type="checkbox"/>	WASTE MANAGEMENT OF NORTH AMERICA, INC

3. **Consent Decree (CD-3) dated 9/10/99:**

- a. Page 1 states 'Re: Consent Decree with Original Generator Defendants'. In SEMS, the below parties are linked to the CD:

Parties Associated with Activity	
View ▾	Maximize
	Party Name
<div>Nonresponsive based on revised scope</div>	
Number of Parties: 9	

- b. As noted under UA-1, the same ongoing response actions (OU2 PRP LR (ME-3) and OU4 PRP LR (ME-1)) are also linked to CD-3.

Response Action(s) Paid by Parties without Paid Oversight [Associated with Activity]						
View ▾	Maximize					
Select	Work Package Name	Planned Start	Actual Start	Planned Finish	Actual Finish	Scap Comment
<input type="checkbox"/>	PRP RD #005	12/30/2000	9/28/2000	12/30/2001	11/16/2001	AC01/SourceOU3
<input type="checkbox"/>	PRP RD #002	3/31/1992	3/11/1992	5/30/1997	8/22/1997	AC01/CAP/GAS SYST
<input type="checkbox"/>	PRP RA #007	11/16/2001	11/16/2001	9/30/2019	1/18/2005	ELGE-Ongoing RA
<input type="checkbox"/>	PRP LR #003	2/14/2001	2/14/2001	12/31/2025		OU02 corresponds w
<input type="checkbox"/>	PRP LR #001	2/14/2001	2/14/2001	12/31/2025		Ongoing Pump&Trea
<input type="checkbox"/>	PRP RA #006	8/30/1997	8/22/1997	3/30/2001	2/14/2001	PUMP AND TREAT
<input type="checkbox"/>	PRP RD #003	3/31/1992	3/11/1992	12/29/1996	8/22/1997	PUMP AND TREAT
<input type="checkbox"/>	PRP RA #004	12/30/1999	9/30/1999	3/30/2001	2/14/2001	Resid. Filtration
<input type="checkbox"/>	PRP RD #004	6/30/1999	9/10/1999	12/30/1999	9/30/1999	Resid. Filtration

- c. To note, p. 4 of the CD includes the below language in regards to 'Waste Management':

The Owner/Operators, consisting of the Keystone Defendants and Waste Management of Pennsylvania ("Waste Management"),³ and Third- and Fourth-Party Defendants object to the consent decree.⁴ These objections are that: (1) Section VI of

4. Consent Decree (CD-5) dated 4/16/01 (for reference):

- a. In SEMS, the below parties are linked to the CD:

Parties Associated with Activity	
View ▾	Maximize
<input type="checkbox"/>	Party Name
<input type="checkbox"/>	KEYSTONE SANITATION LANDFILL
<input type="checkbox"/>	Ex. 6 Personal Privacy (PP)
<input type="checkbox"/>	WASTE MANAGEMENT OF NORTH AMERICA, INC
Number of Parties: 4	

- b. In terms of active response actions linked, the in-progress OU3 PRP LR (ME-4) action is associated to CD-5.

Response Action(s) Paid by Parties without Paid Oversight [Associated with Activity]						
View ▾	Maximize					
Select	Work Package Name	Planned Start	Actual Start	Planned Finish	Actual Finish	Scap Comm
<input type="checkbox"/>	PRP RD #005	12/30/2000	9/28/2000	12/30/2001	11/16/2001	AC01/Sourcer
<input type="checkbox"/>	PRP RA #007	11/16/2001	11/16/2001	9/30/2019	1/18/2005	ELGE-Ongoin
<input type="checkbox"/>	PRP LR #004	1/19/2005	1/19/2005	12/31/2025		

Thank you and enjoy the rest of your day.

Sondra (Sandy) Allen
Superfund Enforcement Data Quality Coordinator
U.S. EPA - Region 3
Superfund & Emergency Management Division
Program Support & Cost Recovery Branch
Program Support Section (3SD42) – Cubicle (7-118)
215-814-3150 (phone)

From: Rugala, Mary <Rugala.Mary@epa.gov>

Sent: Monday, April 12, 2021 9:31 AM

To: Allen, Sondra <Allen.Sondra@epa.gov>; Sklaney, Christopher <sklaney.christopher@epa.gov>

Cc: Wenograd, Bonnie <Wenograd.Bonnie@epa.gov>; Dinsmore, Andrew <Dinsmore.Andrew@epa.gov>

Subject: RE: ADDITION: FW: ACTION REQUEST: Open UAOs in SEMS Not Captured on the Compliance Monitoring Reports / SEMS Compliance Monitoring Screens

Ex. 5 AC/DP

Ex. 5 AC/DP

I probably need to get a copy of the UAO you are speaking of...Thanks. (See the 9/30/96 UA-2 attached.)

Mary E. Rugala
Sr. Asst. Regional Counsel
U.S. EPA, Region III (3RC10)
1650 Arch St.
Phila., PA 19103
215-814-2686
215-814-2603 (fax)
rugala.mary@epa.gov

This e-mail, including attachments, is intended only for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner

From: Rugala, Mary
Sent: Friday, April 09, 2021 7:54 PM
To: Allen, Sondra <Allen.Sondra@epa.gov>; Sklaney, Christopher <sklaney.christopher@epa.gov>
Cc: Wenograd, Bonnie <Wenograd.Bonnie@epa.gov>; Dinsmore, Andrew <Dinsmore.Andrew@epa.gov>
Subject: RE: ADDITION: FW: ACTION REQUEST: Open UAOs in SEMS Not Captured on the Compliance Monitoring Reports / SEMS Compliance Monitoring Screens

Ex. 5 AC/DP

I am happy to discuss and/or provide additional information. Thanks.

Mary E. Rugala
Sr. Asst. Regional Counsel
U.S. EPA, Region III (3RC10)
1650 Arch St.
Phila., PA 19103
215-814-2686
215-814-2603 (fax)
rugala.mary@epa.gov

This e-mail, including attachments, is intended only for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner

From: Allen, Sondra <Allen.Sondra@epa.gov>
Sent: Friday, April 09, 2021 4:58 PM

To: Sklaney, Christopher <sklaney.christopher@epa.gov>

Cc: Wenograd, Bonnie <Wenograd.Bonnie@epa.gov>; Rugala, Mary <Rugala.Mary@epa.gov>; Dinsmore, Andrew <Dinsmore.Andrew@epa.gov>

Subject: ADDITION: FW: ACTION REQUEST: Open UAOs in SEMS Not Captured on the Compliance Monitoring Reports / SEMS Compliance Monitoring Screens

ADDITION: Highlighted below, also updated in SEMS, the 2001 CD has been linked to the IO sub action for the Keystone UAO.

The following actions have been taken in SEMS for Keystone Sanitation Landfill:

1. Added Closed Order or Settlement (IO-5) under the UAO (UA-2) action with a 4/16/2001 actual finish.
2. Added Reviewer Comment: The UAO was replaced by CD-5 dated 4/16/2001.
3. Associated document: 4/16/2001 CD

The updated is reflected on the PGM-T-016 report.

*Sondra (Sandy) Allen
Superfund Enforcement Data Quality Coordinator
U.S. EPA - Region 3
Superfund & Emergency Management Division
Program Support & Cost Recovery Branch
Program Support Section (3SD42) – Cubicle (7-118)
215-814-3150 (phone)*

From: Allen, Sondra

Sent: Friday, April 09, 2021 2:23 PM

To: Sklaney, Christopher <sklaney.christopher@epa.gov>

Cc: Wenograd, Bonnie <Wenograd.Bonnie@epa.gov>; Rugala, Mary <Rugala.Mary@epa.gov>; Dinsmore, Andrew <Dinsmore.Andrew@epa.gov>

Subject: RE: ACTION REQUEST: Open UAOs in SEMS Not Captured on the Compliance Monitoring Reports / SEMS Compliance Monitoring Screens

Hi Chris,

The following actions have been taken in SEMS for Keystone Sanitation Landfill:

1. Added Closed Order or Settlement (IO-5) under the UAO (UA-2) action with a 4/16/2001 actual finish.
2. Added Reviewer Comment: The UAO was replaced by CD-5 dated 4/16/2001.

The updated is reflected on the PGM-T-016 report.

Thank you.

*Sondra (Sandy) Allen
Superfund Enforcement Data Quality Coordinator
U.S. EPA - Region 3
Superfund & Emergency Management Division
Program Support & Cost Recovery Branch
Program Support Section (3SD42) – Cubicle (7-118)
215-814-3150 (phone)*

Christopher Sklaney
Remedial Project Manager
Superfund & Emergency Management Division
U.S. Environmental Protection Agency Region 3
1650 Arch Street (Mail Code 3SD21)
Philadelphia, PA 19103
215-814-3198 | office
sklaney.christopher@epa.gov | email

From: Allen, Sondra <Allen.Sondra@epa.gov>
Sent: Tuesday, March 16, 2021 2:31 PM
To: Rossi, Debra <Rossi.Debra@epa.gov>; Barber, Joshua <Barber.Joshua@epa.gov>; Sklaney, Christopher <sklaney.christopher@epa.gov>
Cc: Geiger, William <Geiger.William@epa.gov>; Dinsmore, Andrew <Dinsmore.Andrew@epa.gov>; Chun, Susie <Chun.Susie@epa.gov>; Wenograd, Bonnie <Wenograd.Bonnie@epa.gov>
Subject: ACTION REQUEST: Open UAOs in SEMS Not Captured on the Compliance Monitoring Reports / SEMS Compliance Monitoring Screens

Hi Deb, Josh, and Chris,

BLUF: Your response is kindly requested by April 8, 2021. We have received a data request from HQs related to **Nonresponsive based on revised scope**, and (Keystone Sanitation Landfill, UA-2 dated 9/30/1996). The data request is regarding open UAOs for response activities in SEMS. We have been asked to verify whether they are still active. Please review the questions below and provide responses as appropriate. The corresponding UAOs, as identified in SEMS, are also attached for reference.

Question: Are the UAOs still active? (e.g., Is work that was designated to be completed under the UAO still ongoing/planned?) Please see options and corresponding questions below:

- If the UAO is still active, are you able to provide the following (also noted in red for each site below):
 - a. Est. Value of PRP Response Work \$ value
 - b. Response Action(s) to be linked to the UAO (including OU(s))
 - c. Name(s) of PRP(s) (for **Nonresponsive based on revised scope** only)
- If the UAO is still active, but you cannot provide the items noted above, please confirm.
- If the UAO is no longer active, please confirm and provide the following:
 - a. Response Action(s) to be linked to the UAO (including OU(s))
 - b. Date all work was completed under the UAO

FYI: General info associated to each UAO in SEMS:

Nonresponsive based on revised scope

Nonresponsive based on revised scope

3. **Keystone Sanitation Landfill, UA-2 dated 9/30/1996 (RPM: Chris Sklaney):**

- a. **UA-2 SCAP Note:** Coord & coop w/gener
- b. **Enforcement Inst. Cat:** Performing Response Work
- c. **Law/Section:** 106
- d. **PRPs:** Waste Management of Pennsylvania; Waste Management of North America, Inc.
- e. **Est Value PRP Resp:** \$0.00
- f. **Response Actions:** None associated
- g. **UAO identified in SEMS-RM (attached):** "Administrative Order for Remedial Design and Remedial Action, Operable Unit No. 1"
- h. **Docket #:** III-96-93-DC

*Sondra (Sandy) Allen
Superfund Enforcement Data Quality Coordinator
U.S. EPA - Region 3
Superfund & Emergency Management Division
Program Support & Cost Recovery Branch
Program Support Section (3SD42) – Cubicle (7-118)
215-814-3150 (phone)*

From: Bell, Mary <Bell.Mary@epa.gov>

Sent: Wednesday, March 10, 2021 4:48 PM

To: Ludwig, Patti <Ludwig.Patti@epa.gov>; Mari, Arthur <mari.arthur@epa.gov>; Figueroa, Natividad <Figueroa.Nati@epa.gov>; Giacalone, Kristin <Giacalone.Kristin@epa.gov>; Wilson, Eric <Wilson.EricJ@epa.gov>; Keating, Robert <Keating.Robert@epa.gov>; Hwilka, Theresa <Hwilka.Theresa@epa.gov>; Chun, Susie <Chun.Susie@epa.gov>; Allen, Sondra <Allen.Sondra@epa.gov>; Whitley, Charlotte <whitley.charlotte@epa.gov>; Painter, Paula <Painter.Paula@epa.gov>; Walters, Lavetta <walters.lavetta@epa.gov>; Mitchell, Tyler J. <Mitchell.Tyler.J@epa.gov>; Hollier, Alice <Hollier.Alice@epa.gov>; Eppler, David <Eppler.David@epa.gov>; Capuyan, Stephen <Capuyan.Stephen@epa.gov>; Quick, Michelle <Quick.Michelle@epa.gov>; Lim, Dianna <Lim.Dianna@epa.gov>; Castro, Kevin <Castro.Kevin@epa.gov>; Zamastil, Douglas <zamastil.doug@epa.gov>; Johnson, Edward <johnson.edward@epa.gov>

Cc: Vanroden, Victoria <Vanroden.Victoria@epa.gov>; Keim, Stephen <Keim.Stephen@epa.gov>

Subject: Open UAOs in SEMS Not Captured on the Compliance Monitoring Reports / SEMS Compliance Monitoring Screens

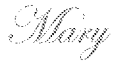
Good afternoon,

Attached is a list of open UAOs in SEMS that are not captured on the compliance monitoring reports or SEMS compliance monitoring screens, because they are missing remedy/cost data. Some of the UAOs have old compliance monitoring values. Many of the UAOs are fairly old and it may be just a matter of data cleanup in some cases. There are only a few open UAOs that need to be reviewed in each Region.

Please review the sites/enforcement instruments applicable to your Region and if appropriate please close them in SEMS using the 'IO' activity. UAOs that should not be closed should be included in the quarterly compliance monitoring universe for review. For those UAOs, please enter any missing remedy/cost data in SEMS, if known, so they will show up on the compliance monitoring reports and on the SEMS compliance monitoring screens and update their compliance

status, if necessary. If there are UAOs that should not be closed, but the missing data is not known please let me know. The data will be pull again for review on Monday, April 12, 2021.

Thank you

A handwritten signature in cursive script that reads "Mary".

Mary Bell
U.S. Environmental Protection Agency, Headquarters | OECA, Office of Site Remediation Enforcement
1200 Pennsylvania Avenue, NW | Washington, DC 20460 | mailcode: 2273A
phone: (202) 564-2256 | e-mail: Bell.Mary@epa.gov

The opinion(s) expressed in this e-mail message are those of the sender and do not represent the position of EPA unless specifically so stated herein. Additionally, the information contained in this message is intended only for the person(s) to whom it is addressed and may contain privileged or confidential material. If you are not the intended recipient, or believe you may have received this message in error, please notify the sender and delete the message you received. Do not print, copy, retransmit, disseminate, rely on, or otherwise use the information.